

From: Matt Antonelli matt@ahtlawfirm.com 

Subject: Re: Snyders v. St. Jude

Date: November 8, 2017 at 1:43 PM

To: Alex S Rinn ARinn@carlsoncaspers.com, Sarah Ring (sring@ringipfirm.com) sring@ringipfirm.com, Zac zac@ahtlawfirm.com, larrythompson larry@ahtlawfirm.com, Allison Newberry anewberry@ahtlawfirm.com, Stafford Davis (sdavis@stafforddavisfirm.com) sdavis@stafforddavisfirm.com

Cc: Joe W Winkels JWinkels@carlsoncaspers.com, aiancu@irell.com, mchu@irell.com, Heinrich, Alan (AHeinrich@irell.com) AHeinrich@irell.com, Johannesson, Leah (ljohannesson@irell.com) ljhannesson@irell.com



Alex—This interrogatory response is deficient in that the response says that the portico valve is covered by 1 or more of a list of patents, but does not actually identify the patents that are covered by the valve. The interrogatory asks SJM to identify only those patents that SJM contends covers its product for purposes of this litigation, so SJM's objection that this interrogatory is unduly burdensome is not well taken. Moreover, we are entitled to know why SJM contends any such patent covers its products. Please let us know when you are available to meet and confer about SJM's deficient response to this interrogatory. Best regards, —Matt

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From: Alex S Rinn <ARinn@carlsoncaspers.com>

Date: Monday, November 6, 2017 at 6:52 PM

To: Matt Antonelli <matt@ahtlawfirm.com>, Sarah Ring <sring@ringipfirm.com>, Zac <zac@ahtlawfirm.com>, Larry Thompson <larry@ahtlawfirm.com>, Allison Newberry <anewberry@ahtlawfirm.com>, "Stafford Davis (sdavis@stafforddavisfirm.com)" <sdavis@stafforddavisfirm.com>

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Subject: Snyders v. St. Jude

Counsel,

Attached and served upon you is St. Jude's Response to Snyders' Interrogatory No. 15.

Best,
Alex

**CARLSON
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